

# **EXHIBIT 4**

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

Page 1

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

-----x  
IN RE GOOGLE PLAY STORE Case No.  
ANTITRUST LITIGATION 3:21-md-02981-JD

THIS DOCUMENT RELATES TO:  
Epic Games Inc. v. Google LLC, et al.,  
Case No: 3:20-cv-05671-JD

In re Google Play Consumer  
Antitrust Litigation,  
Case No: 3:20-cv-05761-JD

In re Google Play Developer  
Antitrust Litigation,  
Case No: 3:20-cv-05792-JD

State of Utah, et al.,  
v. Google LLC, et al.,  
Case No: 3:21-cv-05227-JD

-----x  
\*HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY\*

REMOTE VIDEOTAPED DEPOSITION BY VIRTUAL ZOOM OF  
CHRISTOPHER LI  
Tuesday, May 24, 2022

Reported By: Lynne Ledanois, CSR 6811

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

Page 11

1 Kumagai.

2 MS. WOODIN: Good morning. Christine  
3 Woodin from Hueston Hennigan on behalf of the Match  
4 Group entities.

5 MR. DICKLER: Michael Dickler, Sperling &  
6 Slater, on behalf of the Developer plaintiffs.

7 MR. MILLER: Good morning. Adam Miller,  
8 Deputy Attorney General, State of California for the  
9 State plaintiffs. With me on realtime on the video  
10 is Michael Altebrando from Utah and also realtime is  
11 Brendan Benedict also from Utah.

12 MS. CURRAN-HUBERTY: Good morning. This  
13 is Emily Curran-Huberty of Munger Tolles & Olson on  
14 behalf of the witness and Google. With me is Kevin  
15 Benedicto of Morgan Lewis & Bockius. Also with me  
16 is Alex Zbrozek from Google.

17 THE VIDEOGRAPHER: Is that everybody  
18 present for today? Thank you.

19 CHRISTOPHER LI,  
20 having been duly sworn, testified as follows:

21 EXAMINATION

22 BY MR. BYARS:

23 Q Good morning, Mr. Li.

24 A Good morning.

25 Q Like I said, my name is John Byars. I'm

1 Q Do you think that is what  
2 Play-Auto-Install is?

3 A I don't remember the full scope of it.  
4 Actually, I would like to -- I don't want to -- I'm  
5 not the Play-Auto-Install expert.

6 Q Do you have any idea why that requirement  
7 is in Section 3.6?

8 A My recollection is that it's a better user  
9 experience because you offer the choice to the user to  
10 not install something.

11 Q Do you know what Install Packages  
12 permissions is?

13 A I don't know the technical details behind  
14 it. But I think it's -- yes, it's an app with the  
15 ability to install the packages, so...

16 Q Is it an app with the ability to install  
17 other apps?

18 A Yes, I think that's one downstream  
19 implication of that.

20 Q And is it an app -- does an app with  
21 Installs Packages Permission have an ability to  
22 update apps automatically?

23 A I'm not sure, but I suspect it could have  
24 that ability.

25 Q Now, if we go back to Attachment D, which

1 is on Page 365.

2 And before I ask you questions about  
3 Attachment D, why would Google not allow any  
4 non-Google apps that are preloaded on the device to  
5 have Install Packages permission?

6 MS. CURRAN-HUBERTY: Object to form.

7 THE WITNESS: So on the specification of  
8 Google apps versus non-Google apps, I think that we  
9 felt confident that we would know how Google apps  
10 performs because we're all on the same company.

11 So I think that's why the conditions were  
12 not needed for Google apps, because we knew that  
13 there would be a certain level of respect and  
14 experience for the user that would maintain our  
15 standard.

16 On why we felt like we needed some of  
17 these terms inclusive of the alternative Play  
18 service thing that you mentioned, this tier of  
19 devices is called Premier Tier and back to the theme  
20 of what I discussed earlier of wanting to create  
21 better devices to compete against Apple, we wanted  
22 to create a device experience that we felt like was  
23 at par or close to at par with that.

24 With that expectation comes an expectation  
25 from the user that it doesn't feel scammy, the

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

Page 141

1 device feels secure, among other things.

2 BY MR. BYARS:

3 Q So it's actually Foundation Tier; right?  
4 You can go back and look at Page 378 and it's  
5 Foundation Tier.

6 A Yes, there's Foundation Tier and Premier  
7 Tier. But I think foundation is -- how I define  
8 foundation is you need to have -- there is a baseline  
9 experience.

10 And I would also argue that the items I  
11 mentioned is sort of the baseline for what you would  
12 expect for a, I don't know, 500-dollar phone.

13 Q And when you can't have install  
14 packages -- does an app store need Install Packages  
15 permission to install other apps?

16 MS. CURRAN-HUBERTY: Object to form.

17 THE WITNESS: I'm not sure.

18 BY MR. BYARS:

19 Q I think you said that you -- Install  
20 Packages permission allows you to install -- what  
21 did you say, packages?

22 A I said I don't know the definition. I don't  
23 know the technical details of what the Install Package  
24 permission gives, but I can guess that you need it to  
25 be able to update or install other apps.

1 Google would receive for Google Play?

2 A I don't know exactly what this row means.

3 Q Well, let me ask you this: Does Row 25  
4 mean the number of devices where Google obtained  
5 Play exclusivity or projected to obtain Google Play  
6 exclusivity?

7 A I think this row -- this cell, can represent  
8 the projected number of devices that enrolled in  
9 Premier Tier across the set of 13 partners at this  
10 point in time.

11 What we felt like we got from a Play  
12 perspective is a device, because it's called  
13 Premier, that offered an enhanced experience in  
14 terms of UX, safety and the overall presentation of  
15 downloading and installing apps to users.

16 Q And by that do you mean that Google Play  
17 would be the only app store on the devices enrolled  
18 in the Premier Tier?

19 MS. CURRAN-HUBERTY: Object to form.

20 THE WITNESS: What I meant is what I said  
21 before. It would be an enhanced Play experience  
22 because it offers more security, a better and more  
23 intuitive UX for users and an overall better  
24 download and app update experience.

25